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Floyd Nichols

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cc: cbarnitz@utah.gov, Kelcey Land/ENF/R8/USEPA/US@EPA, Nancy
Mueller/OCP/R8/USEPA/US@EPA

Subject: OSC-PacifiCorp (1/26/04)

Attached and printed below is the referenced letter.

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PacifiCorp (1-26-04).wp

January 26, 2004

John Loomis, IH
Senior Environmental Analyst
Power Delivery, Safety & Environment
PacifiCorp
825 NE Multnomah
Portland, OR 97232

Dear Mr. Loomis:

In the late 1990's, the Environmental Protection Agency (EPA), along with several other Federal, state, and local agencies, began investigating adverse health impacts resulting from human exposure to ore excavated from the Vermiculite Mine located near Libby, Montana. Subsequently, EPA determined that human exposure to a mineral constituent found in this particular ore body, identified herein as Libby Amphibole asbestos ('LA'), can have grave human health consequences.

As we discussed last year, the (former) Vermiculite Intermountain (VI) exfoliation facility (previous address 333 West 100 South, Salt Lake City, Utah) was located immediately east of the above-ground structures and hardware comprising the Utah Power and Light electrical substation at 147 South 400 West, Salt Lake City, Utah. The perimeter fence encircling the substation parcel encompasses, in part, the footprint of the demolished VI facility. I was informed during one of our 2003 conversations that Utah Power and Light (UPL), a subsidiary of PacifiCorp, is now owned by Scottish Power.

Existing records indicate that the Vermiculite Intermountain facility received over 25,000 tons of ore from the Libby mine between 1940 and the early 1980's. Normal VI operating procedures during that period called for the raw ore to be heated in a dry furnace so as to cause thermal-induced expansion of imbedded layers within the ore. Products resulting from this thermal expansion subsequently entered the Salt Lake City-area commercial, wholesale and retail markets. Residues and residuals from this ore treatment activity are still present at the VI site and on adjacent property(ies).

Following initial discussions between you and Joyce Ackerman of this office in early 2002, EPA collected soil samples from the VI site in October 2002. Analysis of those samples showed elevated levels of Libby Amphibole asbestos present on the ground surface and at varying subsurface horizons. Documentation of that activity is contained in the Sampling and Analysis Plan (for the) Former Vermiculite Facility-SLC2. I mailed you a copy of the January 20, 2003 Summary Report on that activity on April 10, 2003, and we discussed the contents of that Summary on several occasions after that date. (During one of our discussions, you also mentioned that PacifiCorp had initiated asbestos abatement activities on the VI parcel after receiving a report on our laboratory analysis of the October 2002 samples.)

In response to my request to conduct further investigations on and around the VI parcel, you and several of your neighbors allowed us to collect additional outside and indoor samples at various locations on September 22-24, 2003. On October 21, I received a verbal report that very high levels of Libby Amphibole asbestos had been found in one of the dust samples collected from inside a small block building in the middle of the substation. I subsequently phoned that preliminary information to you, and suggested that you may want to consider restricting access to the building to persons wearing suitable PPE. On October 28, I provided you with a copy of the analytical data report.

You may or may not be aware that EPA collected additional air and dust samples inside buildings immediately to the north, east, and south of the VI parcel on December 1-3, 2003, to better characterize the exposure experienced by people working inside those buildings on a daily basis. The analytical data from that sampling effort has now been received, and we have recently shared that information with the property owners.

EPA, in consultation with the Utah Department of Environmental Quality (UDEQ), has evaluated the information derived from our recent studies, and concluded that active remediation be considered for at least two of the properties in the study area: The Utah Power and Light substation, and inside the Artistic Printing Company (just to the north of the substation). Possible recommendations to and/or suggested remedies for any LA contamination found on the other immediately-adjacent properties, the Ampco Parking Lot and Frank Edwards building (LaQuinta Inns) and by the Utah Paper Box Company, are still being considered.

I'd like an opportunity to discuss the above information with you, and to explore possible cleanup options for the substation parcel. Our preliminary information shows the UPL substation parcel size to be approximately 55,000 sq ft, with varying amounts of LA present in various soil horizons across the site and in the block building in the middle of the site. For the purposes of

this discussion, I'll take the liberty of subdividing the surface area into three portions: 1) A roughly rectangular area inside the old VI foundation, at the northwest corner of that footprint (approximately 1500 sq ft); 2) the balance of the area inside the old VI foundation (approximately 6700 sq ft), and 3) the balance of the UPL parcel (approximately 47,000 sq ft) except for 4) the footprint of the 2-story block building. Our current information suggests that as much as ten (10) vertical feet of soil may need to be removed from area 1 (150 cubic yards), as much as three (3) vertical feet from area 2 (6,700 cubic yards), and as much as one and one-half (1 ½) vertical feet from area 3 (2,600 cubic yards), for a total of approximately 3,900 cubic yards. In addition, a thorough asbestos abatement project should be conducted inside the block building.

Cleanup of the site will be performed under the purview of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or 'Superfund') and the National Contingency Plan (NCP). Accordingly, please have your Counsel contact Matthew Cohn of this office, at 303.312.6853, to discuss the appropriate agreements. In addition, thank you for agreeing to attend a detailed technical discussion of these recommendations in Salt Lake City at 9:00 am, Friday, January 30, 2004, at the UDEQ offices at 168 North 1950 West.

If you have any questions ahead of time, please call me at 303.312.6983, or Craig Barnitz, UDEQ, at 801.536.0071.

Sincerely

-S-

Floyd D. Nichols
On Scene Coordinator
EPA/8

cc e-mail: Craig Barnitz, UDEQ
Kelcey Land, EPA/8
Nancy Mueller, EPA